

**ADAM J. BREEDEN, ESQ.**  
Nevada Bar No. 008768  
**BREEDEN & ASSOCIATES, PLLC**  
7432 W. Sahara Ave., Suite 101  
Las Vegas, Nevada 89117  
Phone: (702) 819-7770  
Fax: (702) 819-7771  
Adam@Breedendandassociates.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

GARY DEAN DILLMAN, an individual,  
  
Plaintiff,

v.

STATE OF NEVADA on relation of the  
NEVADA HIGHWAY PATROL; AARON  
CRISP, in his individual capacity; DOES I-V,  
inclusive,

Defendants.

CASE NO. 2:25-CV-00443-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

The parties recently held a conference to discuss Defendant Aaron Crisp's active military leave on June 26, 2025. As a result of this leave, Defendant Crisp will be unavailable for deposition until October 2025. The parties now submit a Stipulation to Extend Discovery Deadlines (First Request) and request that the current deadlines be extended for 120 days from the deadlines established in the Discovery Plan and Scheduling Order [ECF No. 10] filed April 10, 2025. The extension is sought due to Defendant being on active military duty until the beginning of October.

**I. DISCOVERY COMPLETED TO DATE**

1. Plaintiff has served initial disclosures and one supplement, which includes nearly 300 pages of documents and 11 witnesses;
2. Defendants State of Nevada on relation of the Nevada Highway Patrol and Aaron Crisp have served their initial disclosure, which includes 65 pages of documents, 17 videos, and 4 witnesses;

1 3. Plaintiff propounded interrogatories and requests for documents on Defendant Aaron Crisp  
2 and interrogatories, requests for documents, and requests for admission on State of Nevada  
3 on relation of the Nevada Highway Patrol on April 18, 2025, to which Defendant responded  
4 to the requests for admission on May 5, 2025 and the remaining responses were provided on  
5 May 21, 2025.

6 4. Plaintiff has noticed the FRCP 30(b)(6) designee of Nevada Highway Patrol for July 16,  
7 2025 and July 18, 2025.

8 **II. DISCOVERY YET TO BE COMPLETED**

- 9 1. Depositions of all parties and witnesses, including experts  
10 2. Expert practice  
11 3. Completion of any written discovery

12 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

13 As stated above, Defendant Aaron Crisp is currently on active military duty and is  
14 unavailable for deposition until October 1, 2025. There is good cause for the requested extension.

15 **IV. PROPOSED EXTENDED DEADLINES**

16 The parties respectfully request this Court enter an order as follows:

- 17 1. Discovery Cut-Off Date. The new discovery cut-off date is **January 13, 2026**.  
18 2. Amending the Pleadings and Adding Parties. The current deadline is **June 17, 2025**. The  
19 parties do not request an extension of this deadline.  
20 3. Expert and Rebuttal-Expert Disclosures. The new deadline to disclose experts is **November**  
21 **14, 2025**. The deadline to disclose rebuttal experts is **December 16, 2025**.  
22 4. Dispositive Motions. The new deadline to file dispositive motions is **February 12, 2026**.  
23 5. Pretrial Order. The new deadline to file a pretrial order is **March 16, 2026**. If dispositive  
24 motions are filed, the deadline for filing the joint pretrial order will be suspended until 30  
25 days after the decision on the dispositive motions or further court order.  
26 6. Extensions or Modifications of the Discovery Plan and Scheduling Order. In accordance  
27 with LR 26-3, applications to extend any date set by the discovery plan, scheduling order,  
28 or other order must, in addition to satisfying the requirements of LR 6-1, be supported by a

1 showing of good cause for the extension. All motions or stipulations to extend a deadline set  
2 forth in a discovery plan shall be received by the Court not later than 21 days before the  
3 expiration of the subject deadline. A request made after the expiration of the subject deadline  
4 shall not be granted unless the movant demonstrates that the failure to set was the result of  
5 excusable neglect. Any motion or stipulation to extend a deadline or to reopen discovery  
6 shall include:

- 7 a. A statement specifying the discovery completed;
- 8 b. A specific description of the discovery that remains to be completed;
- 9 c. The reasons why the deadline was not satisfied or the remaining discovery was not  
10 completed within the time limits set by the discovery plan; and
- 11 d. A proposed schedule for completing all discovery.

12 The parties submit that good cause exists for an extension of the current deadlines. The  
13 parties seek additional time due to the fact Defendant Aaron Crisp is on active military leave until  
14 the beginning of October. Additional time is needed so that the parties will have sufficient time to  
15 conduct his deposition and complete any necessary additional discovery prior to expert disclosures  
16 in light of Crisp's military leave until October 1, 2025. This request is timely. This brief delay will  
17 not substantially impede this matter. This is the first discovery extension request. No trial date has  
18 been set and dispositive motions have not yet been filed.

19  
20  
21  
22 [remainder of page intentionally blank]  
23  
24  
25  
26  
27  
28

Further, Plaintiff served a second set of Request for Production of Documents and Interrogatories on Defendant Aaron Crisp on June 2, 2025. This discovery pertains to punitive damages and discovery of financial information. Counsel has conferred regarding these written discovery requests and the deadline for Defendant to respond to these requests are stayed until 14 days after the dispositive motion deadline. If dispositive motions are filed to dismiss punitive damages, this deadline is stayed until 14 days after the ruling of the dispositive motions at which time the Defendant will respond if the punitive damages claims remain. However, objections to these requests or motions for protective order must be made within 30 days of the entering of this Order. If no objections are made by this deadline, all objections are waived.

**IT IS SO STIPULATED AND AGREED.**

Dated this 16<sup>th</sup> day of July, 2025.

**BREEDEN & ASSOCIATES, PLLC**

/s/ Adam J. Breeden

**ADAM J. BREEDEN, ESQ.**

Nevada Bar No. 008768  
7432 W. Sahara Ave., Suite 101  
Las Vegas, Nevada 89117  
Phone: (702) 819-7770  
Fax: (702) 819-7771  
Adam@Breedendassociates.com  
*Attorneys for Plaintiff*

Dated this 16<sup>th</sup> day of July, 2025.

**OFFICE OF THE ATTORNEY GENERAL**

/s/ Adam D. Honey

**AARON D. FORD, ESQ.**

Attorney General  
**ADAM D. HONEY, ESQ.**  
Nevada Bar No. 9588  
1 State of Nevada Way, Suite 100  
Las Vegas, Nevada 89119  
Phone: (702) 486-3573  
Fax: (702) 486-3773  
*Attorneys for Defendants*

The Court notes that the parties essentially seek a limited stay of discovery regarding Plaintiff's second set of requests for production of documents and interrogatories served on Defendant Aaron Crisp. Although the parties did not cite the applicable standard for a stay, the Court nonetheless finds that they have shown good cause for the stay they seek. *See Schrader v. Wynn*, 2:19-cv-02159-JCM-BNW, 2021 WL 4810324, at \*2-4 (D. Nev. Oct. 14, 2021).

**IT IS THEREFORE ORDERED** that the stipulation to extend discovery (ECF No. 13) is **GRANTED**.

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: July 17, 2025